

IN THE UNITED STATES DISTRICT COURT  
FOR THE DISTRICT OF DELAWARE

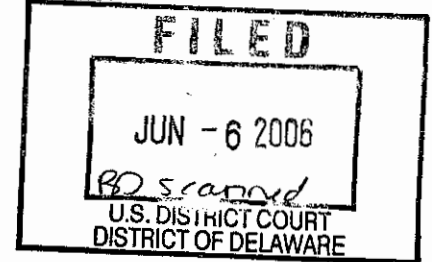
WILLIAM A. NEWSOM,  
PLAINTIFF,

v.

COMMISSIONER STANLEY W. TAYLOR,  
BUREAU CHIEF PAUL HOWARD, DEPUTY  
WARDEN DAVID PIERCE, CAPTAIN SAGERS,  
SECURITY SUPERINTENDENT CUNNINGHAM,  
FIRST CORRECTIONAL MEDICAL, LLC,  
DR. SITTA B. ALIE, ET. AL.  
DEFENDANTS.

CIVIL ACTION NO. 05-673-GMS

MOTION FOR APPOINTMENT OF  
COUNSEL



Pursuant to 28 U.S.C. 1915(e)(1) Plaintiff moves for  
an order appointing counsel to represent him in this case. In support  
of this motion, Plaintiff states:

1. Plaintiff is unable to afford counsel. He has requested leave to proceed in forma pauperis.
2. Plaintiff's imprisonment will greatly limit his ability to litigate. The issues involved in this case are complex, and will require significant research and investigation. Plaintiff has limited access to the law library and limited knowledge of the law.
3. A trial in this case will likely involve conflicting testimony, and counsel would better enable Plaintiff to present evidence and cross-examine witnesses.
4. Plaintiff has made repeated attempts to obtain counsel. Attached to this motion is:

Exhibit A - Letter from Plaintiff to Delaware Center for Justice, dated September 16, 2004.

Exhibit B - Letter from Plaintiff to ACLU, dated November 12, 2004.

Exhibit C - Letter from Plaintiff to Deputy Warden Pierce stating that Plaintiff sought legal counsel and forwarded his information to Stephen Hampton, ESQ. Letter dated March 22, 2006.

Exhibit D - Return letter to Plaintiff from Stephen Hampton, ESQ. stating that he is currently reviewing a large number of letters from inmates not receiving adequate health care, and that he will try to respond specifically to my case. Letter dated April 18, 2006.

Wherefore, Plaintiff request that the court appoint

Raymond Radulski, a member of the Delaware Bar, as counsel in this case.

or

Plaintiff request that the court appoint Stephen Hampton, a member of the Delaware Bar, as counsel in this case.

DATE:

June 4, 2006

William A. Newsom

WILLIAM A. NEWSOM  
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